

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

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MARTÍN JONATHAN BATALLA VIDAL, et al., )

*Plaintiffs,* )

v. )

KIRSTJEN NIELSEN, Secretary, Department of )  
Homeland Security, et al., )

*Defendants.* )

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Case No. 1:16-cv-04756 (NGG) (JO)

December 17, 2017

**DECLARATION OF AMY S. TAYLOR**

I, Amy S. Taylor declare under penalty of perjury that the following is true and correct:

1. I am an attorney at law, and am one of the counsel for Plaintiffs in this case. I submit this declaration in support of Plaintiffs' Motion for Class Certification.
2. I am a 2006 graduate of the City University of New York School of Law and have been practicing law continuously in New York since 2007.
3. I served as a Staff Attorney at Legal Services NYC from 2007 to 2015. Since 2015, I have been employed at Make the Road New York ("MRNY"), and I am currently one of the organization's Co-Legal Directors. In this capacity, I direct MRNY's legal department and oversee all litigation at MRNY, which has litigated complex cases in federal court for over fifteen years.
4. MRNY's legal department is comprised of twenty-four attorneys and eleven paralegals who provide legal services, including full legal representation to immigrant clients. MRNY provides legal advice and representation to immigrant clients in immigration, wage and hour, discrimination, civil rights, public benefits, and housing cases.

5. MRNY provides legal assistance to over 9,000 individuals a year under my supervision. Since the inception of DACA, we have opened 4,560 DACA or DACA Renewal cases, assisting a total of 3,323 individuals. Since there are approximately 42,000 DACA recipients in New York State, MRNY has served nearly 8% of DACA recipients in New York. In addition, we have conducted Know Your Rights presentations covering information on how to apply for DACA. During the first two years of DACA, we routinely held weekly screening workshops and weekend clinics, which were staffed by our attorneys, advocates, administrative staff, and volunteers. Consistently from June of 2012 until the last day that DACA renewal applications were accepted, we held weekly DACA screening workshops at our Queens office and similar services at our other sites on an as-needed basis, escalating the number of workshops, screenings, and appointments in the final month that USCIS accepted DACA renewal applications.

6. Since 2005, the principal focus of my legal practice has been in the areas of civil rights, discrimination, immigration law, and related federal court litigation. I personally have served as lead or principal co-counsel in numerous federal court cases related to civil rights issues. *See Flores Zabaleta v. Duke, et al*, 17-cv-07512 (S.D.N.Y) (mandamus action on behalf of immigrant denied access special immigrant juvenile status by USCIS); *Doe et al. v. Cuomo*, 14-cv-02674 (E.D.N.Y) (challenging discrimination by state agency against HIV positive individual); *Tobierre, et al v. Wasserman*, 14-cv-02398 (E.D.N.Y) (challenging racial discrimination under Fair Housing Act on behalf of African-American tenants); *Padilla v. City of New York, et al.*, 13-cv-0076 (E.D.N.Y) (challenging discriminatory policing against limited English proficient New Yorkers); *Doe v. Harlem United Community Aids Center, Inc.*, 15-cv-02179 (S.D.N.Y) (challenging discriminatory actions by non-profit against HIV positive

individual); *Paulino et al. v. Carrion*, 07-cv-5775 (S.D.N.Y) (raising due process challenge to state agency's denial of rights to limited English proficient day care provider).

7. MRNY has served as lead or principal co-counsel in numerous federal court cases related to civil rights issues. *See Gil-Diaz v. Frantzis*, No. 17-1520 (E.D.N.Y 2017) (bringing wage and hour claims under the Fair Labor Standards Act [FLSA]); *Lopez Chajon et al. v. Tatrault et al.*, No. 16-4122 (E.D.N.Y 2016) (same); *Aguilar et al. v. Aliaged Dining Inc. et al.*, No. 16-2369 (E.D.N.Y. 2016) (same); *Espinoza et al. v. Sky City Apartments, LLC et al.*, No. 14-2368 (granting conditional class certification for wage and hour claims under FLSA); *EEOC et al. v. Suffolk Laundry Svcs. et al.*, 48 F.Supp.3d 497 (E.D.N.Y. 2014) (bringing employment discrimination claims under Title VII).

8. Counsel have already devoted significant resources to investigating and identifying the claims of potential class members and to maintaining this litigation, as evidenced by the staffing of this case with experienced attorneys, and will continue to do so.

9. Counsel do not anticipate any reason that other class members would dispute the adequacy of MRNY's representation.

I, Amy S. Taylor, declare under penalty of perjury, under 28 U.S.C. § 1746 and the laws of the United States of America, that the foregoing Declaration is true and correct.

Executed this 17th day of December 2017 in New York, New York.

By: /s/ Amy S. Taylor  
Amy S. Taylor (AT2056)

### **CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2017, a true and correct copy of the foregoing corrected declaration was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

/s/ Michael Wishnie

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